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 11 UNITED STATES DISTRICT COURT
 12 CENTRAL DISTRICT OF CALIFORNIA
 13
 14 UNITED STATES OF AMERICA, Case No. 5:23-CR-00021-JGB
 Plaintiff,
 15 vs.
 16 JASON EDWARD THOMAS
 CARDIFF,
 17 Defendant.
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**UNOPPOSED EX PARTE
 APPLICATION FOR LEAVE TO
 FILE MOTION TO DISMISS
 INDICTMENT WITH PREJUDICE,
 DECLARATION OF STEPHEN G.
 LARSON IN SUPPORT OF
 MOTION TO DISMISS
 INDICTMENT WITH PREJUDICE
 AND EXHIBITS *UNDER SEAL*;
 DECLARATION OF STEPHEN G.
 LARSON**

[Filed concurrently with [Proposed] Order]

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EX PARTE APPLICATION FOR LEAVE TO FILE UNDER SEAL**I. CONTACT INFORMATION FOR OPPOSING COUNSEL PURSUANT
TO C.D. CAL LOCAL RULE 7-19**

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II. APPLICATION

The Defense hereby applies for an order authorizing the filing of an unredacted versions of his Motion to Dismiss Indictment with Prejudice, the Declaration of Stephen G. Larson in support of Motion to Dismiss Indictment with Prejudice, and Exhibits *under seal*.

The parties in this matters stipulated to a protective order. (ECF No. 37.) Section 5(k) of the protective order provides “[i]n the event that a party needs to file Confidential Information with the Court or divulge the contents of Confidential Information in court filings, the filing should be made under seal.” Both the Motion to Dismiss Indictment with Prejudice (“Motion”) and Declaration of Stephen G. Larson in support of Motion to Dismiss Indictment with Prejudice; Exhibits (“Exhibits”) contain information that has been identified as Confidential Information by the government. Accordingly, in order to abide by the stipulated terms of the protective order in this matter, the Defense requests this sealing order.

1 On April 1, 2024, the government advised by email that it does not oppose
2 this request.

3 Dated: April 8, 2024

4 LARSON LLP

5 By: 

6 _____
7 Stephen G. Larson
8 Hilary Potashner
9 Jonathan Gershon

10 Attorneys for Defendant
11 JASON EDWARD THOMAS CARDIFF

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DECLARATION OF STEPHEN G. LARSON

I, Stephen G. Larson, hereby declare and state as follows:

1. I am a partner at Larson LLP, attorneys of record for Defendant Jason Cardiff. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify to the matters stated herein.

2. Pursuant to L.R. 7-19, I submit this declaration in support of Jason Cardiff's *Ex Parte* Application for Leave to File Cardiff's Motion to Dismiss Indictment with Prejudice and Declaration of Stephen G. Larson in Support of Motion to Dismiss Indictment with Prejudice; Exhibits *under seal*.

3. On April 1, 2024, the government sent an email to defense counsel informing that it does not oppose this sealing request.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on this 8th day of April, 2024, at Los Angeles, California.

Stephen G. Larson

PROOF OF SERVICE

United States of America v. Cardiff
Case No. 5:23-CR-00021-JGB

STATE OF , COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of . My business address is 555 South Flower Street, 30th Floor, Los Angeles, CA 90071.

On April 8, 2024, I served true copies of the following document(s):

**UNOPPOSED *EX PARTE* APPLICATION FOR LEAVE TO FILE
MOTION TO DISMISS INDICTMENT WITH PREJUDICE,
DECLARATION OF STEPHEN G. LARSON IN SUPPORT OF MOTION TO
DISMISS INDICTMENT WITH PREJUDICE AND EXHIBITS *UNDER
SEAL*; DECLARATION OF STEPHEN G. LARSON**

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address hpark@larsonllp.com to the persons at the e-mail addresses listed in the attached Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on April 8, 2024, at Los Angeles, California.

Haewon Park

SERVICE LIST

United States of America v. Cardiff
Case No. 5:23-CR-00021-JGB

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